

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE
WITNESS EMILY ROSENBERG
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES
NPMHU/USPS-T3-37 THROUGH 42**

The United States Postal Service hereby files the responses of witness Emily Rosenberg to the above-listed interrogatories of the National Postal Mail Handlers Union dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T3-37 Please state whether you or anyone else at the Postal Service has run any models or simulations on the network that would result if the decisions announced by the Postal Service on February 23, 2012, and published at <http://about.usps.com/what-we-are-doing/our-future-network/assets/pdf/communications-list-022212.pdf> are implemented. If the answer is yes, please describe those models or simulations, and provide associated Library References. If the answer is no, please state whether there are any plans to do so.

RESPONSE:

Any additional analysis was conducted under the applicable facility-specific consolidation opportunity review process such as the USPS Handbook PO-408 AMP guidelines. See my response NPMHU/USPS-T3-18(c).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T3-38 Please explain what steps the Postal Service has taken, or will take, to ensure that the network resulting from the AMP decisions announced on February 23, 2012, is a “rationalized” network that can process and distribute mail within the proposed revised service standards. If any such steps have been taken, please provide supporting documentation in the form of a library reference.

RESPONSE:

See my response NPMHU/USPS-T3-18(c). Facility-specific consolidation feasibility review processes such as the USPS Handbook PO-408 guidelines will be employed.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T3-39 Please confirm that the distribution network developed by the LogicNet model would not apply to the network that would result if the decisions announced on February 23, 2012, are implemented. If not confirmed, please explain how this network developed by the computer model would apply, given the differences between the network developed by the model and that resulting from the decisions announced on February 23, 2012.

RESPONSE:

Confirmed. The LogicNet modeling was the starting point for discussions in the summer of 2011 that led to the development of the September 2011 list of consolidation opportunities that were studied. The study results were announced on February 23. Thus, the LogicNet model was an early decision support tool, not a decision making tool.

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NPMHU/USPS-T3-40 Please explain whether any computer modeling software will be used in the process of developing a distribution network in the network that would result if the decisions announced on February 23, 2012, are implemented, and, if so, what the role of that software will be.

RESPONSE:

See my response NPMHU/USPS-T3-18(c). Facility-specific consolidation feasibility review processes such as the USPS Handbook PO-408 guidelines and subsequent implementation do not involve additional network modeling.

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TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T3-41 Please explain what steps, if any, the Postal Service has taken to resolve irrationalities identified in the model by the Step 4 (Deeper Dive Analysis)—e.g., calculations of optimality in the LogicNet model based on impossibilities like partial machines, in arriving at the network announced by the Postal Service on February 23, 2012. If no steps have been taken, please identify the individual(s) who made the determination that modification of the model based on Step 4 was no longer needed and describe in detail the process by which the determination was made.

RESPONSE:

See my response NPMHU/USPS-T3-18(c). Equipment deployment determinations are resolved through facility-specific review processes such as the USPS Handbook PO-408 guidelines.

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TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

NPMHU/USPS-T3-42 Please confirm that the Postal Service completed the building layout review and approval process described on page 18, footnote 25 of your testimony and incorporated this analysis into the network announced by the Postal Service on February 23, 2012. If not confirmed, please identify the individual(s) who decided that the building layout review was no longer necessary and describe in detail the process by which this determination was made. If confirmed, please provide the documents associated with this review as a Library Reference.

RESPONSE:

See my response NPMHU/USPS-T3-18(c). As indicated in the footnote cited in the question, the review of facility floor space and the feasibility of locating specific mail processing operations at particular sites are matters examined during facility-specific review processes such as the USPS Handbook PO-408 guidelines.